

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

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LANDFALL TRUST LLC, :
Plaintiff, :
v. : Civil Action No. 3:22-cv-00194-RCY
FIDELITY NATIONAL TITLE INSURANCE :
COMPANY, :
Defendant. :
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**DEFENDANT FIDELITY NATIONAL TITLE INSURANCE COMPANY'S MOTION
FOR PROTECTIVE ORDER**

COMES NOW Defendant Fidelity National Title Insurance Company (“Fidelity”), by counsel, in accordance with Rule 26 and 37 of the Federal Rules of Civil Procedure, and moves the Court for a protective order with regard to certain of Plaintiff’s First Interrogatories, Requests for Production of Documents, and Requests for Admission to Defendant (“Plaintiff’s First Request”)¹ and the entirety of Plaintiff’s Second Interrogatories, Requests for Production of Documents, and Requests for Admission to Defendant and Plaintiff’s Third Interrogatories and Requests for Admission to Defendant. As set forth in the accompanying brief in support of this Motion, Fidelity has properly objected to Plaintiff’s discovery requests. Fidelity respectfully requests and hereby moves that the Court prohibit the Plaintiff from further attempts to compel responses from Fidelity and order any such further relief to Fidelity as the Court deems appropriate.

¹ With respect to Plaintiff’s First Request, Fidelity seeks a protective order concerning Plaintiff’s Interrogatories 5-18, Requests for Production 2, 4 and 7, and Request for Admission 3.

Fidelity has attempted in good faith to resolve the discovery disputes that are the subject of this motion and has been unable to do so.

Respectfully submitted,

/s/ Jon Hollis

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Counsel for Defendant Fidelity National Title Insurance Company

CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of January 2023, a true and accurate copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification to all counsel of record.

/s/ Jon Hollis